

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

TIMOTHY TAYLOR,	)	
	)	
Plaintiff,	)	
v.	)	
	)	
DISCOVERY, INC. and	)	<b>STIPULATION OF VOLUNTARY</b>
THE EXPLORERS CLUB,	)	<b>DISMISSAL PURSUANT TO</b>
	)	<b>F.R.C.P. 41(a)(1)(A)(ii)</b>
Defendants,	)	
and	)	
	)	Civil Action No. 1:21-cv-03046-JSR
THE EXPLORERS CLUB,	)	
	)	
Third-Party Plaintiff,	)	
v.	)	
	)	
SYLVIA EARLE and THE SYLVIA EARLE	)	
ALLIANCE d/b/a MISSION BLUE,	)	
	)	
Third-Party Defendants.	)	
_____	)	

**STIPULATION OF VOLUNTARY DISMISSAL PURSUANT TO F.R.C.P. 41(a)(1)(A)(ii)**

**WITH PREJUDICE**

IT IS HEREBY STIPULATED AND AGREED by and between the parties and their respective counsels that pursuant to Fed. R. Civ. P. 41(a)(1)(A)(ii), and subject to a confidential settlement agreement, the above-captioned action is voluntarily dismissed with prejudice against the defendants and third-party defendants. The Court shall retain jurisdiction to enforce the terms of the settlement agreement.

Each party to bear its own costs and attorneys' fees.

Date: September 1, 2021

Respectfully submitted,

**Barclay Damon LLP**

By: /s/ Michael A. Oropallo  
Michael A. Oropallo  
Lauren J. Wachtler  
1270 6<sup>th</sup> Avenue Suite 501  
New York, New York 10020  
Telephone: (315) 425-2831  
Facsimile: (315) 703-7367  
moropallo@barclaydamon.com

*Attorneys for Plaintiff Timothy Taylor*

**Thompson Coburn LLP**

By: /s/ Michael L. Nepple  
Michael L. Nepple – *pro hac vice*  
mnepple@thompsoncoburn.com  
Thompson Coburn LLP  
One US Bank Plaza  
St. Louis, Missouri 63101-1611  
(314) 552-6000

*Attorney for Defendant and Third-Party Plaintiff  
The Explorers Club*

**Davis Wright Tremaine LLP**

By: /s/ Jeremy A. Chase  
Jeremy A. Chase  
Davis Wright Tremaine LLP  
1251 Avenue of the Americas, 21<sup>st</sup> Floor  
New York, New York 10020  
[jeremychase@dwt.com](mailto:jeremychase@dwt.com)  
(212) 489-8230

*Attorney for Defendant Discovery, Inc.*